

STEVEN M. COHEN*
LITIGATION CHAIR

PHONE: 716.636.7600
DIRECT FAX: 716.932.6718
SCOHEN@HOGANWILLIG.COM

*ALSO LICENSED IN PA

MR. COHEN'S SECRETARY:
STEPHANIE SWEENEY
DIRECT PHONE: 716.932.6754
SSWEENEY@HOGANWILLIG.COM



HOGANWILLIG
ATTORNEYS AT LAW

MAIN OFFICE:
2410 NORTH FOREST ROAD | SUITE 301 | AMHERST, NEW YORK 14068
PHONE: 716.636.7600 | TOLL FREE: 800.636.5255 | FAX: 716.636.7606

WWW.HOGANWILLIG.COM
SERVICE BY FAX AND EMAIL NOT ACCEPTED

ADDITIONAL OFFICES:
155 SUMMER STREET
BUFFALO, NY 14222

43 CENTRAL AVENUE
LANCASTER, NY 14086

6133 ROUTE 219 S
ELLCOTTVILLE, NY 14731

770 DAVISON ROAD
LOCKPORT, NY 14094

October 27, 2022

Hon. Michael J. Roemer (By email: roemer@nywd.uscourts.gov)
United States Magistrate Judge
Robert H. Jackson U.S. Courthouse
2 Niagara Square
Buffalo, New York 14202

Re: Case No. 19-CR-227

Dear Judge Roemer:

Defendant Gerace is seeking to file a motion to suppress with a supporting memorandum that is in excess of the (25) pages allowed according to Rule 12 of the Local Rules of the Western District of New York. This FRCP Rule 47, and Rule 12(b)(3)(C) and 12(b)(3)(A)(iv) and (v), motion will be filed in a case in which pre-trial matters have been assigned to Your Honor by Judge Sinatra pursuant to 28 U.S.C. § 636(b)(1).

The Memorandum in support of this motion has over six pages of relevant facts, and complex matters of Fourth Amendment law and government policies that needed to be properly addressed. We respectfully seek your permission to file a 49-page memorandum in support along with a separate notice of motion to suppress. Copies of this request have been sent to all counsel pursuant to Rule 12.

Respectfully,

Steven M. Cohen, Esq.

Cc:

James Harrington, Esq. (Notice by PACER and email: JPH@harringtonmahoney.com)
Jordan Alan Dickson, Esq. (Notice by PACER and email: Jordan.dickson@usdoj.gov)
Joseph M. LaTona, Esq. (Notice by PACER and email: sandyw@tomburton.com)
Jesse Colton Pyle, Esq. (Notice by PACER and email: jpyle@harringtonmahoney.com)
Joseph M. Tripi, Esq. (Notice by PACER and email: joseph.tripi@usdoj.gov)
David J. Rudroff, Esq. (Notice by PACER and email: david.rudroff@usdoj.gov)